

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 21, 2018

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

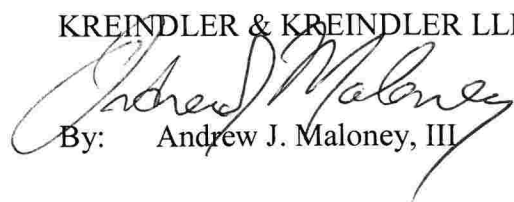
The Plaintiff's Executive Committee (PECs), on behalf of all Plaintiffs, and the Department of Justice (DOJ), jointly write to respectfully request that the Court extend the deadline for the joint status report regarding the status of the government's declassification and privilege review, *see* ECF No. 4259, from December 28, 2018 to January 4, 2019.

On the evening of December 20, 2018, the FBI produced a second tranche of documents in response of the PECs' subpoena. The PECs need an opportunity to review those documents and confer internally and then confer with the DOJ, in advance of the filing of the joint status report. Given the upcoming holidays and resulting difficulty in scheduling the necessary discussions during the next week, the PECs and DOJ respectfully request that the deadline for the joint status report be extended to January 4, 2019. The PECs and DOJ note that they are scheduled to speak regarding the issues to be addressed in the joint status report on January 2, 2019.

The PECs and DOJ thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

KREINDLER & KREINDLER LLP


By: Andrew J. Maloney, III